

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**PAULSON PRV HOLDINGS LLC,  
EARLE HC LLC,**

**PLAINTIFFS,**

**vs.**

**BETTER PUERTO RICO LLC, FAHAD  
GHAFFAR,**

**DEFENDANTSS.**

**CIVIL NO. 24-1541 (MAJ)**

**JOINT MOTION FOR VOLUNTARY DISMISSAL WITH PREJUDICE**

**TO THE HONORABLE COURT:**

**COME NOW** Paulson PRV Holdings LLC and Earle HC LLC, both of whom are Plaintiffs in Civil Number 24-1541 (MAJ) and who are hereinafter referred to collectively as “Plaintiffs,” and Better Puerto Rico LLC and Fahad Ghaffar, hereinafter referred to collectively as “Defendants”, through their undersigned attorneys, and very respectfully state, allege and request as follows:

Pursuant to Rule 41(a)(1)(ii) of the Federal Rules of Civil Procedure, the parties hereby stipulate to the dismissal of all claims filed by Plaintiffs against Defendants in the instant case with prejudice and without the imposition of costs nor attorney’s fees, as the parties have reached an agreement to dispose of all litigation, and present and future controversies, related to the Vanderbilt Residences Development and Earle HC LLC

The parties further stipulate that the dismissal judgment with prejudice to be entered will be final and unappealable.

**WHEREFORE**, the appearing parties very respectfully request that this Honorable Court enter judgment dismissing with prejudice all claims filed by plaintiffs, Paulson PRV Holdings LLC and Earle HC LLC, against Defendants

**RESPECTFULLY SUBMITTED.**

**WE HEREBY CERTIFY** that on this same date we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to attorneys of record.

In San Juan, Puerto Rico, this 6th day of March 2025.

*Counsel for Plaintiffs*

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